



June 28, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of *Ex Parte* Communication, MB Docket Nos. 18-202, 17-317, 17-105; MD Docket No. 19-105

Dear Ms. Dortch:

On Wednesday, June 26, President and CEO Gordon Smith, Emmy Parsons and the undersigned, all of the National Association of Broadcasters (NAB), met with Commissioner Brendan Carr, Evan Swarztrauber and Shelby Morbach to discuss the above-captioned proceedings.

NAB thanked Commissioner Carr for the Commission's diligent work to modernize the Commission's rules regarding children's television programming and television broadcaster carriage election notices.¹ Updating these rules makes sense in the modern media marketplace and will decrease the burdens broadcasters face to comply with FCC regulations.

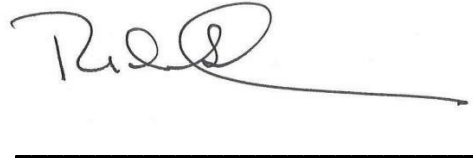
NAB also addressed the major challenges presented by the Commission's proposed Fiscal Year 2019 regulatory fees.² NAB explained that the Notice of Proposed Rulemaking (NPRM) gave stakeholders, and especially broadcasters, almost no means to offer meaningful feedback due to the lack of information provided. The NPRM's failure in this regard has major consequences, especially for the radio industry. While the Commission's budget is projected to increase only 5.3 percent, under the current fees proposal, most radio broadcasters would pay 18-20 percent more in regulatory fees for 2019 than they did in

¹ See *Children's Television Programming Rules*, Public Draft, Report and Order and Further Notice of Proposed Rulemaking, MB Docket Nos. 18-202, 17-105, FCC-CIRC1907-06 (June 19, 2019) (Draft Children's TV Order); *Electronic Delivery of MVPD Communications*, Report and Order and Further Notice of Proposed Rulemaking, MB Docket Nos. 17-317, 17-105, FCC-CIRC1907-07 (June 19, 2019) (Draft Carriage Order).

² *Assessment and Collection of Regulatory Fees for Fiscal Year 2019*, Notice of Proposed Rulemaking, MD Docket No. 19-105 (May 8, 2019).

2018. As NAB previously explained, despite this disproportionate increase, however, the Commission's NPRM fails to provide any real explanation.³ NAB urged the Commissioner to take a hard look at this issue and to encourage his colleagues to ensure that stakeholders have the information they need to help the Commission reach a fair result.

Respectfully submitted,
NATIONAL ASSOCIATION OF BROADCASTERS

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan
General Counsel and Executive Vice President
Legal and Regulatory Affairs

cc: Commissioner Carr, Evan Swarztrauber, Shelby Morbach

³ See Comments of the National Association of Broadcasters, MD Docket No. 19-105 (June 7, 2019).